

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

<hr/>	§	
In re	§	Chapter 11
	§	
HAHN HOTELS OF SULPHUR SPRINGS, LLC,¹	§	Case No. 17-40947
	§	
Debtor.	§	
<hr/>	§	
In re	§	Chapter 11
	§	
HAHN INVESTMENTS, LLC,	§	Case No. 17-60341
	§	
Debtor.	§	
<hr/>	§	
In re	§	Chapter 11
	§	
HAHN HOTELS, LLC,	§	Case No. 17-60342
	§	
Debtor.	§	
<hr/>	§	
In re	§	Chapter 11
	§	
SLEEP INN PROPERTY, LLC,	§	Case No. 17-60343
	§	
Debtor.	§	
<hr/>	§	

¹ The Debtors in these chapter 11 cases are, including the last four digits of their respective EIN number, as follows: Hahn Hotels of Sulphur Springs, LLC (2980), Hahn Investments, LLC (0448); Hahn Hotels, LLC (5692), Sleep Inn Property, LLC (6525), SI of Longview, LLC (2196), and Copeland's of Longview, LLC (6181). The shared mailing address for all Debtors is: 525 Gilmer St., PO Box 113, Sulphur Springs, Texas 75482.

In re

SI PROPERTY OF LONGVIEW, LLC,

Debtor.

Chapter 11

Case No. 17-60344

In re

COPELAND'S OF LONGVIEW, LLC,

Debtor.

Chapter 11

Case No. 17-60345

**DEBTORS' EMERGENCY MOTION FOR AN ORDER DIRECTING JOINT
ADMINISTRATION OF CHAPTER 11 CASES**

Hahn Hotels of Sulphur Springs, LLC, Hahn Investments, LLC, Hahn Hotels, LLC, Sleep Inn Property, LLC, SI of Longview, LLC, and Copeland's of Longview, LLC, each a Texas limited liability company (collectively, the "**Debtors**"), file this *Emergency Motion for An Order Directing Joint Administration of Chapter 11 Cases* (the "**Motion**"). In support of the Motion, the Debtors incorporate by reference the *Declaration of Dante E. Hahn in Support of First Day Motions and Applications*, dated May 1, 2017 (the "**First Day Declaration**") and respectfully represent as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction over this Motion under 28 U.S.C. § 1334(b). This Court can hear and determine this matter in accordance with 28 U.S.C. § 157 and the standing order of reference of bankruptcy cases and proceedings in this District. This matter is a core proceeding, and venue for this Motion is proper in this district under 28 U.S.C. §§ 1408 and 1409.

BACKGROUND

2. On May 1, 2017 (the “**Petition Date**”), the Debtors filed voluntary petitions for relief in this Court under chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”).

3. Each of the Debtors remains in possession of its property and is operating its business as debtor-in-possession, pursuant to sections 1107 and 1108 of the Bankruptcy Code. No trustee, examiner, or statutory committee has been appointed in these chapter 11 cases.

4. A detailed description of the Debtors’ business, capital structure, and the events leading to these chapter 11 cases is fully set forth in the First Day Declaration and is incorporated herein by reference.

RELIEF REQUESTED

5. Pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”) and Rule 1015 of the Local Rules of Bankruptcy Procedure of the United States Bankruptcy Court for the Eastern District of Texas (the “**Bankruptcy Local Rules**”), the Debtors request entry of an order directing the joint administration of their chapter 11 cases for procedural purposes only and directing the Clerk of the Court to maintain one file and one docket for all six of the Debtors’ chapter 11 cases under the case name and number assigned to Hahn Hotels of Sulphur Springs, LLC.

6. The Debtors request that the order on this Motion provide that nothing contained in the order be deemed or construed as directing or otherwise effecting a substantive consolidation of the above-captioned cases.

7. The Debtors request that the Court direct the Clerk of the Court to make a notation substantially similar to the following on the docket of each of these chapter 11 cases:

An order has been entered in this case directing the joint administration of the chapter 11 cases of Hahn Hotels of Sulphur Springs, LLC, Hahn Investments, LLC, Hahn Hotels, LLC, Sleep Inn Property, LLC, SI of Longview, LLC, and Copeland's of Longview, LLC. The docket in Case No. 17-40947 should be consulted for all matters affecting this case.

8. The Debtors request that the caption of these chapter 11 cases be modified to reflect their joint administration under the lead chapter 11 case of Hahn Hotels of Sulphur Springs, LLC, as follows (including footnote):

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

In re HAHN HOTELS OF SULPHUR SPRINGS, LLC, <i>et al.</i>² Debtors.	§ § § § § § § §	Chapter 11 Case No. 17-40947 Jointly Administered
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9. In accordance with Bankruptcy Local Rule 1015, attached as **Exhibit A** to the Motion is a proposed consolidated master mailing list (matrix) for the Debtors.

BASIS FOR RELIEF

10. Joint administration of the Debtors' chapter 11 cases is warranted in accordance with Bankruptcy Rule 1015(b) and Bankruptcy Local Rule 1015. Bankruptcy Rule 1015(b) states in part that "[i]f . . . two or more petitions are pending in the same court by or against . . . a debtor and an affiliate, the court may order joint administration of the estates."

² The Debtors in these chapter 11 cases are, including the last four digits of their respective EIN number, as follows: Hahn Hotels of Sulphur Springs, LLC (2980), Hahn Investments, LLC (0448); Hahn Hotels, LLC (5692), Sleep Inn Property, LLC (6525), SI of Longview, LLC (2196), and Copeland's of Longview, LLC (6181). The shared mailing address for all Debtors is: 525 Gilmer St., PO Box 113, Sulphur Springs, Texas 75482.

11. Hahn Hotels of Sulphur Springs, LLC, Hahn Hotels, LLC, Sleep Inn Property, LLC, SI of Longview, LLC, and Copeland's of Longview, LLC are each wholly owned subsidiaries of Hahn Investments, LLC. Consequently, the Debtors are affiliates as defined by section 101(2) of title 11 of the United States Code and are appropriate candidates for joint administration under Bankruptcy Rule 1015(b).

12. Joint administration of these cases will eliminate the need for duplicative notices, applications, and orders, thereby saving considerable time and expense for the Debtors, their estates, and the Court. Additionally, supervision of the administrative aspects of these chapter 11 cases by the Office of the United States Trustee will be simplified.

13. Because this is not a motion for substantive consolidation of the Debtors' estates, the rights of the creditors of the Debtors will not be affected adversely by the joint administration of these cases because any creditor may file its claim against a particular estate. In fact, the rights of all creditors will be enhanced by the reduction in costs resulting from joint administration.

14. The Debtors are aware of no facts that may give rise to actual or potential conflicts of interest warranting the separate administration of the Debtors' estates and respectfully assert that creditors' interests would not be jeopardized by the joint administration of the Debtors' cases.

15. In accordance with Bankruptcy Local Rule 1015, the Debtors represent that, given the nature of the Debtors' business and entity structure, Debtors' bankruptcy counsel, financial advisor, and potentially other professionals as may be engaged in the course of these chapter 11 cases cannot effectively or accurately separate services rendered solely for the benefit of one Debtor versus another, justifying the submission of a consolidated application for compensation to be filed solely in the main case, at the proper time(s).

16. By reason of the foregoing, the Debtors submit that the interest of each Debtor, its creditors, and other parties of interest will best be served by the joint administration of these cases and that the Motion should be granted.

NOTICE

17. Notice of this Application has been provided by overnight delivery, hand delivery, email, or facsimile to: (a) the United States Trustee for the Eastern District of Texas; (b) the Debtors' secured creditors; (c) the thirty largest unsecured creditors of the Debtors on a consolidated basis, and (d) the Internal Revenue Service and other governmental entities listed on the Debtors' proposed Limited Master Service List. The Debtors submit that, under the circumstances, no other or further notice is required.

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WHEREFORE, the Debtors respectfully request that the Court enter an order, substantially in the form attached hereto, directing the joint administration of these chapter 11 cases for administrative purposes only, and granting such other and further relief as the Court deems just and proper.

Respectfully submitted: May 1, 2017

By: /s/ Judith W. Ross
Judith W. Ross
State Bar No. 21010670
Eric Soderlund
State Bar No. 24037525
Jessica Lewis
State Bar No. 24060956
Law Offices of Judith W. Ross
700 N. Pearl Street, Suite 1610
Dallas, Texas 75201
Telephone: 214-377-7879
Facsimile: 214-377-9409
Email: judith.ross@judithwross.com
eric.soderlund@judithwross.com
jessica.lewis@judithwross.com

**PROPOSED COUNSEL FOR DEBTORS
AND DEBTORS IN POSSESSION**

CERTIFICATE OF SERVICE

I certify that on May 1, 2017, I served or caused to be served a copy of the foregoing document (i) electronically on the Electronic Case Filing System for the United States Bankruptcy Court for the Eastern District of Texas and (ii) by overnight delivery, hand delivery, email, or facsimile, on the non-Debtor-related parties listed on the attached proposed Limited Master Service List.

/s/ Jessica Lewis
Jessica Lewis

**[PROPOSED] LIMITED MASTER SERVICE LIST
As of May 1, 2017**

Debtors

Hahn Hotels of Sulphur Springs, LLC
525 Gilmer St.
PO Box 113
Sulphur Springs, TX 75482

SI of Longview, LLC
525 Gilmer St.
PO Box 113
Sulphur Springs, TX 75482

Sleep Inn Property, LLC
525 Gilmer St.
PO Box 113
Sulphur Springs, TX 75482

Hahn Hotels, LLC
525 Gilmer St.
PO Box 113
Sulphur Springs, TX 75482

Hahn Investments, LLC
525 Gilmer St.
PO Box 113
Sulphur Springs, TX 75482

Copeland's of Longview, LLC
525 Gilmer St.
PO Box 113
Sulphur Springs, TX 75482

Proposed Debtors' Counsel

The Law Offices of Judith W. Ross
Attn: Judith W. Ross, Eric Soderlund, and
Jessica Lewis
700 N. Pearl Street, Suite 1610
Dallas, Texas 75201
Email: judith.ross@judithwross.com
eric.soderlund@judithwross.com
jessica.lewis@judithwross.com
Fax: 214-377-9409

Proposed Debtors' Financial Advisors

Bridgepoint Consulting
Attn: Dawn Ragan
1700 Commerce St., Suite 810
Dallas, TX 75201
Email: dagan@bridgepointconsulting.com
Fax: 214-937-3680

U.S. Trustee

Office of The United States Trustee
Attn: Timothy W. O'Neal
Bank of America Building
110 North College Avenue, Suite 300
Tyler, Texas 75702-7231
Facsimile: (903) 590-1461

Secured Creditors¹

(a) Lenders and Related Administrators

Austin Bank
911 N.W. Loop 281, 100
Longview, TX 75604

Austin Bank
c/o Michael McNally and Glen Patrick
McNally & Patrick, LLP
100 E. Ferguson, Suite 400
Tyler, TX 75702
michaeljmcnally@suddenlinkmail.com
glenepatrick@suddenlinkmail.com

East Texas Regional Development Company,
Inc.
c/o Kerry Bashaw
3800 Stone Road
Kilgore, TX 75662
kerry.bashaw@etcog.org

First National Bank of Hughes Springs
505 East First Street,
Hughes Springs, TX 75656

First National Bank of Hughes Springs
c/o Josh Searcy
Searcy & Searcy
446 Forest Square
Longview, Texas 75605
joshsearcy@jrsear cylaw.com

Pilgrim Bank
1404 South Broadway
Sulphur Springs, TX 75482

Pilgrim Bank
c/o Scott A. Ritcheson

Ritcheson, Lauffer & Vincent, P.C.
821 ESE Loop 323, Suite 530
Tyler, Texas 75701
scottr@rllawfirm.net

Texas Bank and Trust Company
300 East Whaley
Longview, TX 75601

Texas Bank and Trust Company
c/o John F. Bufe
Potter Minton, a Professional Corp.
500 Plaza Tower
110 N. College
Tyler, TX 75702
johnbufe@potterminton.com

Texas National Bank
612 E. Hawkins Parkway
Longview, TX 75608

Texas National Bank
c/o Michael McNally and Glen Patrick
McNally & Patrick, LLP
100 E. Ferguson, Suite 400
Tyler, TX 75702
michaeljmcnally@suddenlinkmail.com
glenepatrick@suddenlinkmail.com

US Small Business Administration
409 3rd St, SW
Washington, DC 20416
Wells Fargo Bank, NA
NW 6441, PO Box 1450
Minneapolis, MN 55485

¹ The Debtors' inclusion of parties on this Limited Master Service List is solely for the purpose of notice and is not an admission that any party has a valid claim against the Debtors or that any party properly belongs in the designated category or has a claim or legal relationship to the Debtors of the nature described herein.

(b) M&M Lien Claimants²

B.L. Duszik Construction Co.
108 E. Highland Ave.
Longview, TX 75602

Cassity Jones
302 Pine Treet Road
Longview, TX 75604

Chip Miller Plumbing, Inc.
c/o Jamey Voge
Stuber Cooper Voge, PLLC
2600 Network Blvd., Suite 305
Frisco, TX 75034

Dealer's Electrical Supply
PO Box 2676
Waco, TX 76702

Elliott Electric Supply, Inc.
c/o Thomas A. Shiels
8131 LBJ Frwy #700
Dallas, TX 75251

Gallery of Lights
2900 Gilmer Rd.
Longview, TX 75604

Haier US Appliance Solutions, Inc. d/b/a GE
Appliances
c/o Worthy Walker
Gruber Elrod Johansen Hail Shank LLP
1445 Ross Ave., Suite 2500
Dallas, TX 75202

Independent Glass & Mirror
1322 W. Erwin
Tyler, TX 75702

Integribuilt
c/o Larry Porter
1240 Pratt Rd
Red Oak, TX 75154

Ken Parker Service, Inc.
3627 Hwy 43 South
Greenville, TX 75402

Larry's Interiors, Inc.
5717 Old Highway 135 North
Kilgore, TX 75662

Leinart Construction, Inc.
c/o Michael Nixon
Nixon Jach Hubbard, PLLC
JP Morgan International Plaza III
14241 Dallas Pkwy, Suite 575
Dallas, TX 75245
mnixon@njh-law.com

Peter Paul's Plumbing, Inc.
1902 E. US Highway 80
White Oak, TX 75693

Rusty Tucker Sprinkler Company, Inc.
PO Box 630610
Nacogdoches, TX 75961

Sperling Companies, LLC
1386 E. Hwy 154
Quitman, TX 75783

Superior Plastering
2003 CR 426 N.
Henderson, TX 75652

² The creditors in this category filed mechanic's and materialman's liens with respect to the City Center and/or Sleep Inn properties, discussed more fully in the *Declaration of Dante E. Hahn in Support of First Day Motions and Applications*, dated May 1, 2017.

30 Largest Unsecured Creditor List (on a Consolidated Basis)

A1HR, a Div. of Oasis Outsourcing
Contract II, Inc.
3829 Coconut Palm Dr.
Tampa, FL 33619

ALSCO
PO Box 8829
Shreveport, LA 71148-8829

American Modern Insurance Company
PO Box 5323
Cincinnati, OH 45201-5323

BIC- Union Standard Insurance Group
PO BOX 200530
Dallas, TX 75320

Choice Hotels
PO Box 99992
Chicago, IL 60696-7792

Copeland Group USA, Inc.
1203 W Loop 281
Longview, TX 75604

Curtis Blakely & Co., PC
PO Box 5486
Longview, TX 75608

Farmers Insurance
Payment Processing Center
PO Box 660665
Dallas, TX 75266-0665

Farmers Seafood
PO Box 1225
1192 Hawn Ave
Shreveport, LA 71163

Gregg County Tax Assessor-Collector
Kirk Shields - Tax Collector
PO Box 1431
Longview, TX 75606-1431

Guest Supply
PO Box 910
Monmouth Junction, NJ 08852-0910

HD SUPPLY
PO BOX 509058
San Diego, CA 92150-9058

Hopkins County Treasurer
PO Box 288
Sulphur Springs, TX 75483

Image Suite LLC
260 1st Ave S #200-127
St. Petersburg, FL 33701

Innvision Hospitality, Inc
Represented by John A. Swann
2905 Piedmont Road NE, Suite C
Atlanta, GA 30305

Kirby Resturant & Chemical Supply
809 South Eastman Rd
Longview, TX 75602

KLTV/KTRE
105 West Ferguson
Tyler, TX 75702

La Quinta Franchising LLC
PO Box 841946
Dallas, TX 75284-1946

Law Office of Matthew C. Harris, PC
PO Box 4373
Longview, TX 75606

Longview News Journal
PO Box 1792
Longview, TX 75615-0171

MuniServices LLC
Attn Tx Occupancy Tax
PO BOX 830725
Birmingham, AL 35283-0725

Onity, Inc
Lockbox 223067
Pittsburg, PA 15251-2067

Southwind Hospitality, LLC
6295 Central Avenue
Saint Petersburg, FL 33710

Sysco East Texas - Sysco USA 1, Inc.
4577 Estes Pkwy
Longview, TX 75603

TX Lawncare
PO Box 7207
Longview, TX 75607

The Cincinnati Insurance Company
PO Box 145620
Cincinnati, OH 45250-5620

United Healthcare
Dept. CH 10151
Palatine, IL 60055-0151

Thyssenkrupp Elevator Corporaton
PO Box 933004
Atlanta, GA 31193-3004

Wyndham
Independent Analyst - Hotel Systems
14 Sylvan Way, 2nd Floor
Parsippany, NJ 07054

Trimark SS Kemp-Cleveland
PO Box 536326
Pittsburgh, PA 15253-5905

Governmental Entities

Kirk Shields Tax Assessor/Collector
Gregg County
PO Box 1431
Longview TX 75606-1431

Hopkins County Tax Office
PO Box 481
Sulphur Springs, TX 75483

Internal Revenue Service
PO Box 7346
Philadelphia, PA 19101-7346

Notice of Appearance Parties and Parties Requesting Notice

None as of May 1, 2017